

**IN THE UNITED STATE DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

)	
)	Civil Action No. 3:17-cv-03009
GIGI'S CUPCAKES, LLC)	Consolidated with:
)	3:17-cv-3010-B
Plaintiff,)	3:17-cv-3011-B
)	3:17-cv-3012-B
v.)	3:17-cv-3013-B
)	3:17-cv-3014-B
4 BOX, LLC, NIKOLAS PAPPAS, AND)	3:17-cv-3015-B
LORAINE PAPPAS)	3:17-cv-3016-B
)	3:17-cv-3017-B
Defendants.)	3:17-cv-3018-B
)	

MOTION FOR LEAVE TO ENTER AGREED PROTECTIVE ORDER

Plaintiff Gigi's Cupcakes, jointly with Defendants 4 Box LLC, *et al*, hereby move for leave for entry of the attached Agreed Protective Order in order to facilitate motion practice. The parties anticipate the potential exchange of confidential, propriety and sensitive information. In order to protect the confidentiality of any information exchanged, the parties have agreed to the entry of the attached protective order. Further, good cause exists to protect any confidential, proprietary and sensitive information. For these reasons, and pursuant to this Court's Electronic order dated February 1, 2018, Plaintiff and Defendants respectfully request the court enter the Agreed Protective Order.

Dated: February 26, 2018

Respectfully submitted,

WINSTON & STRAWN LLP

By:/s/ John C.C. Sanders, Jr.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on February 26, 2018, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/John C.C. Sanders, Jr.
John C.C. Sanders, Jr.